

January 18, 2001

Jane Henney, M.D..
Commissioner
U.S. Food and Drug Administration
5600 Fisher Lane
Rockville MD 20857-0001

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Dear Dr. Henney:

I have become increasingly concerned with the burgeoning resistance to antibiotics not only in the U.S. but worldwide. While Europe is discontinuing the practice of using antibiotics in agriculture to decrease the causes of that resistance, we have not developed the data on the quantity of antibiotics used in the U.S. to promote growth in livestock that is necessary to establish the links between that and the increasing resistance to antibiotics by the various organisms which infect humans.

The FDA should now establish a system for collecting such basic data on the use of antibiotics not only in agriculture but also in the treatment of humans in the U.S. This information should include the class, indication, dosage and duration of treatment.

Government-guaranteed information on U.S. antibiotic use is necessary in order to arrive at effective solutions for reducing antibiotic use and abuse. I understand that while the FDA recognizes the need for this, so far it has not taken steps to establish such a system.

The Union of Concerned Scientists estimate that a whopping 24.6 million pounds or roughly 70 percent of all antibiotics are fed to healthy cows, pigs and chickens annually for non-therapeutic purposes such as growth promotion; this amount greatly exceeds the 17.8 million pounds reported by industry for all agricultural use of agriculture. When I had a goat dairy from the 1960's to 1990 I used the strategy of good hygiene and proper feed to promote growth and used antibiotics under the guidance to the veterinarian.

I understand from the literature that there is considerable misuse of antibiotics in the treatment of such conditions as the common cold in humans which of course is impervious to that treatment. This abuse should also be tracked. Physicians should not be pressured into prescribing antibiotics for conditions for which they are not indicated..

Please make this a priority before it is too late. Thank you.

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